

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Chuck Booms,)	
)	Case No. 1:23-cv-02099-JPC
Plaintiff,)	
)	Judge J. Philip Calabrese
vs.)	
)	
Gray Media Group, Inc.,)	
)	
Defendant.)	

Gray Media's Partial Motion for Judgment on the Pleadings

In accordance with Fed. Civ. R. 12(c), defendant Gray Media Group, Inc. moves for judgment on the pleadings in its favor on count three of plaintiff's complaint for unjust enrichment. As explained in the attached memorandum, plaintiff Chuck Booms has failed to state a claim for unjust enrichment because he does not, and cannot, allege that he conferred a benefit upon Gray Media, which is an essential element of the claim. The Court should dismiss unjust enrichment with prejudice.

Respectfully submitted,

Dated: January 24, 2024

s/ Matthew J. Cavanagh
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